

Federal Defenders OF NEW YORK, INC.

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June 17, 2020

BY ECF

Honorable Ronnie Abrams
United States District Judge
Southern District of New York

Application granted. Mr. Encarnacion's sentencing is adjourned to July 7, 2020 at 11:00 a.m. The sentencing will proceed remotely by video.

Re: ***United States v. Jesus Encarnacion,***
19 Cr. 118 (RA)

SO ORDERED.



Ronnie Abrams, U.S.D.J.
June 18, 2020

Dear Judge Abrams,

I write to provide an update regarding the scheduled sentencing in this matter. I apologize for the delay in sentencing and submission of the defense letter, but I was unexpectedly hospitalized for several days last week.

I have conferred with the government and the parties propose the following schedule. The defense will file its sentencing submission no later than June 18, 2020, with the government's response due a week later. The parties are then available for sentencing on July 1, 2020 or, in the alternative, any other date convenient for the Court that week or the week of July 6, 2020.

Finally, the defense requests that the sentencing proceed remotely, by video or teleconference, and submits that the interests of justice support proceeding in this manner. As noted in prior correspondence, I expect to go on leave in August or sooner. I have represented Mr. Encarnacion since the outset of this case well over a year ago and would like to afford him continuity of counsel through his sentencing. Mr. Encarnacion is also anxious for his sentencing to proceed. I have conferred with Mr. Encarnacion regarding this matter and understand that he consents to a remote sentencing.

Respectfully submitted,
/s/ Sarah Baumgartel
Sarah Baumgartel, Esq.
T: (212) 417-8772

cc: AUSA Kimberley Ravener (by ECF)